



JAMES E. JOHNSON  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Andrew J. Rauchberg  
Phone: (212) 356-0891  
arauchbe@law.nyc.gov

December 7, 2020

**BY ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *M.G., et al. v. N.Y. City Dep't of Educ., et al.*  
13 Civ. 4639 (SHS) (RWL)

Dear Judge Lehrburger:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the City Defendants in the above-referenced case. I write jointly with Plaintiffs' counsel to respectfully request a short extension of time for Plaintiffs and the City Defendants to submit their next status report.

Pursuant to the Court's Order dated November 9, 2020, the Plaintiffs and the City Defendants are due to submit a status letter regarding discovery, the meet and confer process, and related issues by today, December 7, 2020. We respectfully request an additional week, or until December 14, 2020, to submit the status letter. The parties have met and conferred several times since their last letter to the Court, including for several hours last week. While the parties discussed this letter during their most session on Friday afternoon, additional time is needed to further discuss the various issues that one or both parties may wish to present to the Court. Also, the press of other time-sensitive matters for both Plaintiffs' and City Defendants' counsel made it impossible to continue those discussions today. We will hold additional meet and confer discussions this week and expect to fully update the Court thereafter.

This is the first request to extend this particular deadline, and as noted, Plaintiffs join in the request.

Thank you for your consideration of this matter.

Respectfully submitted,

s/

---

Andrew J. Rauchberg  
Assistant Corporation Counsel

cc: All Counsel of Record

SO ORDERED:

12/8/2020

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

---

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE